

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PPL Electric Utilities Corporation Universal :
Service and Energy Conservation Plan for : Docket No. M-2010-2179796
2011 Through 2013 :

**PREHEARING MEMORANDUM
OF THE PP&L INDUSTRIAL CUSTOMER ALLIANCE**

Pursuant to Administrative Law Judge's October 5, 2010, Prehearing Conference Order, the PP&L Industrial Customer Alliance ("PPLICA") hereby submits this Prehearing Memorandum in the above-captioned proceeding.

I. HISTORY OF THE PROCEEDING

On June 1, 2010, PPL Electric Utilities Corporation ("PPL" or "Company") filed its Universal Service and Energy Conservation Plan for 2011 through 2013 ("Plan") in accordance with Section 54.74 of the Commission's Regulations, 52 Pa. Code § 54.74, requiring jurisdictional electric utilities to file such a plan for Commission approval every three years. Through its Plan, PPL proposes to amend its various Universal Service, customer assistance, low-income, and hardship programs, including: (1) the OnTrack program; (2) the Winter Relief Assistance Program ("WRAP"); (3) Operation HELP; and (4) the Customer Assistance and Referral Evaluation Service ("CARES") program.

A description of PPLICA is set forth in Paragraph 4 of PPLICA's Petition to Intervene. PPLICA's Petition to Intervene awaits disposition by the ALJ. A Prehearing Conference has been scheduled in this proceeding for October 29, 2010.

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II. SERVICE LIST

PPLICA is represented in this matter by Pamela C. Polacek and Shelby A. Linton-Keddie. All correspondence, notices, documents, orders, or other communications with respect to this proceeding should be addressed to Shelby A. Linton-Keddie at the following address:

Shelby A. Linton-Keddie
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
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In addition, PPLICA requests that any electronic service list also include Pamela C. Polacek at the following address: ppolacek@mwn.com.

III. ANTICIPATED ISSUES AND SUB-ISSUES

As indicated in PPLICA's Petition to Intervene, PPLICA is concerned about the potential impact that PPL's Plan will have on Large Commercial and Industrial ("C&I") customers. Specifically, PPLICA is concerned that PPL's Plan costs should be borne only by those customers benefiting from the Plan, and not by Large C&I customers. PPLICA anticipates pursuing these issues during this proceeding and reserves the right to raise other issues and to respond to all issues raised by other parties.

IV. PROPOSED WITNESSES

PPLICA is still evaluating whether it will present any witnesses in this proceeding. If PPLICA determines that it will present such witnesses, PPLICA will inform the ALJ and the other parties as soon as possible. PPLICA also reserves its right to participate in this proceeding through the submission of discovery, cross-examination of other parties' witnesses, and the submission of briefs, exceptions and reply exceptions, if necessary.

V. PROPOSED SCHEDULE AND DISCOVERY RULES

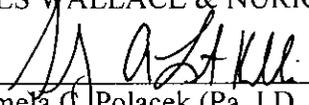
PPLICA will cooperate with the ALJ and the parties at the Prehearing Conference to develop an appropriate schedule and discovery rules in accordance with the Commission's regulations and any ALJ directives.

VI. POSSIBILITY OF SETTLEMENT

PPLICA is willing to participate in discussions with the other parties to amicably resolve the issues in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

Pamela C. Polacek (Pa. I.D. 78276)

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Counsel to the PP&L Industrial Customer Alliance

Dated: October 25, 2010